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Affidavit in Support of Criminal Complaint

Your affiant, Sung KIM, is a Special Agent of the FBI and I am currently assigned to a violent crime task force comprised of FBI agents, detectives from the Baltimore Police Department (BPD), detectives from Howard County Police Department, and detectives from the Baltimore County Police Department (BCDP). I have worked for the FBI since 2008 and have participated in numerous investigations focusing on violent crimes, to include, bank robberies, Hobbs Act robberies, kidnappings, extortions, and fugitives. I have also participated in the execution of numerous state and federal search and arrest warrants involving violent offenders.

I am an "investigative or law enforcement officer of the United States" within the meaning of Section 2510(7) of Title 18, United States Code, that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Section 2516 of Title 18.

I am familiar with the facts provided herein based on my contact with Special Agent Joseph Lear, another Baltimore Division FBI agent who is the lead investigator of the January 22, 2018, Loomis Armored vehicle robbery that occurred in Salisbury, Maryland. I am only including information sufficient to establish probable cause and make evident the persons further identified below robbed the Loomis Armored vehicle.

Loomis Armored US, LLC, (Loomis) currently operates as a division of Loomis AB with operations in the United States, Europe, and South America. As the largest integrated cash distribution network in the United States – with nearly 200 locations, 9,000+ employees, and 3,000+ vehicles – Loomis provides cash-handling products and services to financial institutions and commercial/retail businesses nationwide.

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On Monday, January 22, 2018, at approximately 7:15 a.m., the Salisbury Police Department responded to the armed robbery of a Loomis Armored vehicle that was parked at a branch of State Employees' Credit Union (SECU) located at 1101 Mt. Hermon Road, Salisbury, Wicomico County, Maryland. The Loomis vehicle driver reported that as he was serving an automatic teller machine ("ATM") at the SECU location, men approached him one of whom was displaying a handgun, and demanded money from the ATM as well as the Loomis Armored vehicle he was operating. The Loomis vehicle driver was then disarmed of his service handgun and restrained. Thereafter, two additional men approached, and the driver was taken back to the Loomis Armored vehicle where the men demanded money from the Loomis Armored vehicle and ATM.

Subsequent review of surveillance camera imagery from nearby businesses showed that as the Loomis vehicle driver was removing cash cassettes from the ATM, a sole black male (Suspect 1) approached the driver and placed a gun to his head. Suspect 1 took the driver's service handgun, grabbed him by the hair and ordered the Loomis vehicle driver to open the door of the Loomis vehicle. When the passenger side door of the Loomis vehicle was opened, two additional suspects (Suspect 2 and Suspect 3) dressed in dark clothing appear and remove several bags of money from the Loomis vehicle. Suspect 2 immediately flees to the east of the area while carrying bags of money. Suspect 1 removes zip ties from within clothing on his person, and Suspect 3 forced the Loomis vehicle driver in to the Loomis vehicle where he used the zip ties to secure the driver in the back of the Loomis vehicle. Both Suspects 1 and 3 then flee the area with bags of currency and cash cassettes from the ATM. The robbers stole \$1,324,288 from the Loomis Armored vehicle and ATM.

In the immediate aftermath of the robbery, law enforcement and Loomis offered reward money for information leading to the identification and apprehension of the perpetrators. An informant advised that he/she had heard information that Orneth SOUTH's son was talking about his father, who reportedly ran a robbery crew, having recently scored a big hit, and he was disappointed that he, Orneth South's son, was not cut in on the activity. This tip led investigators to investigate Orneth SOUTH – who then resided in North Carolina – as a possible suspect. A review of law enforcement reporting revealed that in 2017, SOUTH had been detained by law enforcement, along with Ryan SMITH, on suspicion that they were “casing” a bank for an intended robbery in North Carolina. During contact with law enforcement, SMITH advised he was from Maryland and visiting North Carolina. Investigation later confirmed SMITH was then living near Salisbury, Maryland. Further review of surveillance camera imagery from nearby businesses recorded around the time of the Loomis robbery indicated a vehicle possibly used to getaway from the Loomis robbery appeared similar to a vehicle associated with SMITH – a white 2005 GMC Envoy.

Unbeknownst to the robbers, part of their conversation with the Loomis vehicle driver was recorded by a device in the vehicle. A person who was well familiar with Orneth SOUTH's voice listened to the recording and unequivocally identified him as the person referred to above as Suspect 1. In the meantime, it was learned that SMITH had transferred ownership of his vehicle to a female companion approximately 10 days after the robbery.

As the investigation focused on SOUTH, SMITH, an unknown third, and possibly fourth robber; it was learned that Dade County, FL, had a warrant for the arrest of SMITH for a 2014 armed robbery of a pawn shop. Pursuant to that warrant, SMITH was arrested by the US Marshals Service Capital Area Regional Fugitive Task Force on April 10, 2018. On April 17,

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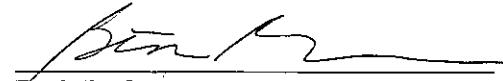
2018, your affiant interviewed SMITH. Prior to questioning him, he was advised of his rights and waived his right to remain silent and have an attorney present. SMITH confessed to being involved, along with SOUTH and a third accomplice he only knows as "Thirsty," in the Loomis Armored vehicle robbery. SMITH admitted that originally that one of the three robbers had a handgun but after they got back in their getaway car, there was another handgun that he assumed had come from the Loomis driver. Among other statements, SMITH also admitted his vehicle, ownership of which had since been transferred to a female companion, was used during the robbery. In the evening of April 17, 2018, law enforcement officers recovered \$261,568, from two different locations after SMITH and his female companion disclosed the locations of the proceeds from the robbery.

Accordingly, I respectfully submit there is probable cause to believe that Orneth SOUTH, Ryan SMITH and a third male, known as "Thirsty," committed the armed robbery of the Loomis armored vehicle on January 22, 2018, in violation of 18 U.S.C. §§ 924(c), and 1951(a).



Sung Kim, Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me this 19th day of April, 2018.



Beth P. Gesner
Chief, United States Magistrate Judge

